

COMMENTS

The enclosed is responsive to the Examiner's Office Action mailed on June 20, 2003. At the time the Examiner mailed the Office Action claims 1 through 5, 7, 9 through 14, 16 and 18 through 59 were pending. By way of the present response the Applicant has: 1) amended claims 18 – 38, 44, 50 and 55; 2) has added new claims 60 – 69; and, 3) has not canceled any claims. As such, claims 1 through 5, 7, 9 through 14, 16 and 18 through 69 are presently pending. No new matter has been added. The Applicant respectfully requests reconsideration of the present application and the allowance of claims 1 through 5, 7, 9 through 14, 16 and 18 through 69.

With respect to independent claims 1, 9 and 10, the Examiner has rejected each of these claims under 35 USC 103 as being obvious in light of the combination of US Patent No. 6,324,644 B1 (hereinafter, "Rakavy") and US Patent No. 6,124,802 (hereinafter, "Ozaki"). The Applicant respectfully submits that the combination of Rakavy and Ozaki fails to disclose, teach or suggest all of the claim elements of independent claims 1, 9 and 10 at least because the term "⁴¹⁷hitless rebuild" appears in each of these claims and nothing in Rakavy or Ozaki could be reasonably construed as covering this element. Both the rebuilds of Rakavy and Ozaki seem to be typical rebuilds in which all memory information is lost during the rebuild.

Independent claims 18, 23, 28, 33, 50 and 55 have each been rejected under 35 USC 103 as being obvious in light of the combination of the Applicant's admitted prior art and US Patent 6,393,582 B1 (hereinafter, "Klecka").

With respect to independent claims 18, 28 and 50, each of these claims recite "a protected memory region" and "routing table information" not being deleted from the protected memory region. With respect to independent claims 23, 33 and 55, each of these claims recite "a protected memory region" and a interface card "status" not being deleted from the protected memory region.

The Applicant respectfully submits that Klecka fails not only to disclose a "protected memory region" but also fails to disclose "routing table information" or an interface card "status not being deleted from the protected memory region. Klecka only discloses that a processor's state information (e.g., the processor's register stack) is dumped into memory pursuant to a soft error. Klecka clearly does not contemplate "a protected memory region". That is, Klecka does not disclose that memory content desired to survive the soft error is stored in a "protected" region of memory.

Moreover, the only specifics of Klecka regarding the content that is to survive the soft error is the processor's state information. By contrast, claims 18, 28 and 50 are directed to the survival of "routing table information" and claims 23, 33 and 55 are directed to the survival of a line card "status". As Klecka fails to mention "routing table information" or a line card "status" Klecka can not teach the surviving of such information. Therefore the combination of Klecka with the

Applicant's admitted prior art fails to cover each of the Applicant's claim elements with respect to independent claims 18, 23, 28, 33, 50 and 55.

With respect to independent claims 38 and 44, a protected memory region is also claimed (See, claim 38 (emphasis added) "said re-initializing not deleting said routing table information from said memory because said instructions are written so as to not access a segment of said memory during said re-initializing"; and, claim 44 (emphasis added) "said re-initializing not deleting said state table information from said memory because said instructions are written so as to not access a segment of said memory during said re-initializing"). As such, because neither the Applicant's admitted prior art nor Klecka discloses a protected memory region in which instructions are written so as to not access a segment of memory during re-initializing, the combination of the Applicant's admitted prior art and Klecka fails to cover each of the Applicant's claim elements for independent claims 38 and 44. The Examiner is directed to page 11, lines 4 – 6 for support regarding the claim language being emphasized with respect to independent claims 38 and 44.

Because each of the Applicant's are in allowable form the Applicant respectfully submits that all claims are in allowable form. The Applicant therefore request the allowance of all claims.

If there are any additional charges, please charge them to our Deposit Account Number 02-2666. If a telephone conference would facilitate the

prosecution of this application, the Examiner is invited to contact Robert B.

O'Rourke at (408) 720-8300.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP



Dated: 10/20, 2003

Robert B. O'Rourke Reg. No. 46,972

12400 Wilshire Blvd.
Seventh Floor
Los Angeles, CA 90025-1026
(408) 720-8300